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Attorneys for Defendants

STATE OF HAWAI‘I DEPARTMENT

OF PUBLIC SAFETY; TOMMY

JOHNSON, Director, Hawai‘i

Department of Public Safety; and GAVIN

TAKENAKA, Health Care Director,

Hawai‘i Department of Public Safety,

Corrections Division

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI‘I

DONNA OPULENTO, on behalf of  
the Estate of JESSICA FORTSON;  
FRANK HAMPP, and JOSEPH TUI,  
individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

STATE OF HAWAI‘I  
DEPARTMENT OF PUBLIC  
SAFETY; TOMMY JOHNSON,  
Director, Hawai‘i Department of  
Public Safety; GAVIN TAKENAKA,

CIVIL NO. 19-00315 RT

STIPULATION FOR DISMISSAL WITH  
PREJUDICE AS TO ALL CLAIMS AND  
PARTIES, AND ORDER

The Honorable Rom Trader

No Trial Date

Health Care Director, Hawai‘i  
Department of Public Safety,  
Corrections Division; DOES 1-30,

Defendants.

**STIPULATION FOR DISMISSAL WITH PREJUDICE  
AS TO ALL CLAIMS AND PARTIES**

IT IS HEREBY STIPULATED pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and Rule 41.1 of Local Rules of Practice for the United States District Court for the District of Hawaii, by and between the parties hereto through their respective counsel, that this action be and hereby is dismissed with prejudice. The agreed-upon attorneys' fees and costs were previously paid to counsel for the Plaintiffs. All remaining claims and parties are dismissed. All parties who have appeared in this action have signed this stipulation.

DATED: Honolulu, Hawai‘i, September 9, 2025.

STATE OF HAWAII

ANNE E. LOPEZ  
Attorney General of Hawai‘i

/s/ Kendall J. Moser

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KENDALL J. MOSER  
Deputy Attorneys General

Attorneys for Defendants  
STATE OF HAWAI‘I DEPARTMENT  
OF PUBLIC SAFETY, TOMMY  
JOHNSON, and GAVIN TAKENAKA

DATED: Honolulu, Hawai‘i, September 9, 2025.

*/s/ Eric A. Seitz*

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Attorneys for Plaintiffs  
DONNA OPULENTO, on behalf of  
the Estate of JESSICA FORTSON, FRANK  
HAMPP, and JOSEPH TUI, individually  
and on behalf of all others similarly situated

APPROVED AS TO FORM:

DATED: September 10, 2025, Honolulu, Hawai‘i.



*Rom A. Trader*

Rom A. Trader  
United States Magistrate Judge

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Civil No. 19-00315 RT; Donna Opulento, et al. v. State of Hawai‘i Department of Public Safety, et al.; Stipulation for Dismissal with Prejudice as to all Claims and Parties, and Order